



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the
Commission's Own Motion to Assess
and Revise the Regulation of
Telecommunications Utilities.

R.05-04-005

Rulemaking for the Purposes of Revising
General Order 96-A Regarding Informal
Filings at the Commission.

R.98-07-038

**REPLY OF PACIFIC BELL TELEPHONE COMPANY
D/B/A AT&T CALIFORNIA (U 1001 C) TO COMMENTS
ON THE PROPOSED DECISION OF COMMISSIONER CHONG
CLARIFYING RULES FOR ADVICE LETTERS UNDER THE UNIFORM
REGULATORY FRAMEWORK AND ADOPTING PROCEDURES FOR DETARIFFING**

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Pacific Bell Telephone Company (“AT&T California”), pursuant to Rule 6.3, replies to the comments of other parties concerning the Proposed Decision of Commissioner Chong (“PD”).

I. CONDITIONS NECESSARY FOR DETARIFFING HAVE BEEN SATISFIED.

TURN contends that the PD errs by allowing detariffing. TURN claims, for example, that Public Utilities Code §495.7 requires a service-by-service analysis before detariffing can be authorized.¹ But nothing in §495.7 requires such an approach. In URF Phase 1, the Commission conducted a thorough review of the extensive record in this proceeding and found that the ILECs lack market power throughout their service territories, and that alternatives are available to customers as substitutes for wireline services.² Because these findings encompass all of the ILECs’ services throughout their service territories, they obviate any need for a service-by-service review.

TURN also contends that the Commission’s competition analysis did not consider market share, as required by §495.7(b)(1). As the PD points out, however, the Commission specifically considered market share but found that it was neither particularly useful nor probative for evaluating market power in today’s telecommunications market.³ The Commission discussed why, from the standpoint of economic analysis, market share data can be a meaningless tool for evaluating market power. TURN may not agree with the Commission, but it is incorrect to contend that the Commission did not consider market share.

TURN also incorrectly contends that the URF Decision does not support a finding that competitive alternatives exist for most customers, because the URF Decision also took into consideration the FCC’s unbundling policies as a limitation on the market power of the ILECs.⁴ The evidence that led to the URF Decision included the availability and substitutability of alternatives such as wireless, cable, and Internet-based voice communications. The Commission rejected arguments by TURN and DRA that the Commission define the market for telecommunications service more narrowly and focus on wireline services.⁵ Instead, the Commission concluded that the market should be defined broadly to include a variety of services and service providers.⁶ As a result, the Commission found that competitive alternatives are widely available.⁷ The Commission also correctly found that the ILECs’ market power is limited by the FCC’s unbundling scheme, “which makes it possible for competitors to provide telecommunications services in every wire center located in their service territories.”⁸ Contrary to TURN’s contention, the URF Decision provides an ample basis for the Commission to conclude that competitive alternatives are available to most customers.

¹ TURN, pp. 2-4. All references to code sections refer to the Public Utilities Code.

² *E.g., Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities*, Decision No. 06-08-030, *Opinion*, 2006 WL 2527822, (Cal.P.U.C. Aug. 24, 2006), pp. 4, 117-133, 262-264, 265-267 (Findings of Fact 50-51), 262-267 (Findings of Fact (“FoF”) 17, 19-20, 32, 36, 39, 44, 50-51, 62-63), 274-275 (Conclusions of Law (“CoL”) 13-20) (hereinafter “URF Decision”).

³ PD, p. 44. *See also* URF Decision, pp. 125-129, 246-247, 266 (FoF 57, 60) 275 (CoL 22-23).

⁴ TURN, pp. 6-7.

⁵ URF Decision, p. 124.

⁶ PD, p. 42.

⁷ URF Decision, pp. 202, 262 (FoFs 18, 20), 263 (FoFs 30, 32), 264 (FoFs 33-39, 41-45), 265 (FoFs 46-47, 49, 51), 267 (FoFs 62-63), 268 (FoF 77), 274 (CoLs 11, 13-14), 276 (CoL 28).

⁸ *Id.* at 274 (CoL 16).

TURN asserts that the consumer protection requirements of §495.7 have not been satisfied.⁹ To the contrary, consumers are protected by numerous laws and regulations covering freedom of choice, disclosure of information, privacy, and enforcement.¹⁰ The Commission also retains its authority and procedures to resolve customer and carrier complaints. Additionally, protection against unfair competition and anticompetitive behavior exists in the form of antitrust laws and statutory requirements that prohibit unfair business practices. These and other consumer protections discussed in the PD satisfy the conditions necessary for the Commission to allow detariffing under §495.7.

TURN argues that the Tier 3 advice letter process (requiring a Commission resolution) is necessary to “reflect the proper application of [§495.7].”¹¹ TURN’s argument is based on its position that §495.7 requirements for detariffing have not been satisfied and that a service-by-service analysis is required. As discussed above, the PD correctly finds the detariffing requirements of §495.7 are satisfied, and there is no valid basis for conducting a service-by-service analysis. Thus, TURN’s proposed Tier 3 treatment should be rejected.

DRA criticizes the PD’s clarification that the term “basic service” means residential basic service.¹² DRA speculates that it is “plausible” that in §495.7, the Legislature intended to preclude detariffing of not only residential basic service, but business basic service as well. The Public Utilities Code does not define the term “basic service,” and the PD’s clarification that the term means residential basic service is both reasonable and consistent with how the Commission has defined the term in the past. DRA’s criticism should be disregarded.

Sprint/Nextel (“Sprint”) asserts the PD should be changed to preclude ILECs from detariffing “retail special access” service in “any future URF decision.”¹³ Sprint’s proposal is based on speculation about what the PD intends to “set the stage” for with its definition of “resale” and a great deal of re-argument by Sprint of its position concerning “special access services.”¹⁴ Sprint’s proposal must be rejected. Special access service was not an issue in Phase 1 of this proceeding, not covered by the Phase 1 decision, and not covered by the PD. The Commission will address special access service in a subsequent decision in this phase of the proceeding. Sprint’s proposal is outside the scope of the PD and should not be adopted because it would prejudge an issue that will be the topic of a *future* decision.

Time Warner, et al., also make a proposal that is inappropriate and extends beyond the intended scope of the PD. Time Warner proposes that the PD be modified to preclude carriers from detariffing access services including switched access and special access, and “any other services presently purchased by CLECs or IXC’s from ILECs under tariff.”¹⁵ While AT&T California agrees that switched access and special access services are beyond the scope of the detariffing granted in the PD, the reference to undefined “other services presently purchased by CLECs or IXC’s from ILECs under tariff” is not only unnecessary, it is incorrect. For example, other carriers currently purchase retail

⁹ TURN, pp. 7-9.

¹⁰ See, e.g., D.06-03-013, Appdx. D (listing consumer protection statutes and regulations).

¹¹ TURN, p. 9. The PD finds that the Tier 2 advice letter process is appropriate for detariffing requests. PD, pp. 51-52.

¹² DRA, p. 7.

¹³ Sprint/Nextel, p. 5.

¹⁴ *Id.* at 4.

¹⁵ Time Warner, p. 2.

services from AT&T California's retail tariff. The URF Phase 1 decision granted full pricing flexibility to these retail services, and the PD appropriately allows their detariffing. Time Warner's proposal should be rejected.

II. CARRIERS IN A DETARIFFED ENVIRONMENT SHOULD NOT BE MICROMANAGED.

TURN and DRA would have the Commission micromanage how carriers establish contractual relationships and communicate with their customers in a detariffed environment. For example, DRA asks the Commission to hold a workshop to establish rules for the form and content of carriers' contracts with customers and to require carriers' contracts to inform customers of their right to submit complaints to the Commission for investigation.¹⁶ DRA and TURN also ask the Commission to mandate the details of how carriers organize and provide information on their websites.¹⁷ Such requests should be rejected.

As the PD correctly recognizes, Commission micromanagement of carriers' contracting practices would only constrain the benefits of the competitive market: "We decline to adopt any content regulation for contracts. In a competitive market, carriers compete on both price and non-price terms. By offering different contract terms and conditions, carriers seek to differentiate themselves from their competitors."¹⁸

Imposing detailed form and substance requirements for carriers' websites similarly would constrain the benefits of competition. Competition requires that carriers respond innovatively and quickly to consumer demand and marketing moves made by their competitors. Innovation can and will occur in service characteristics, pricing structures, and the way information is presented on websites and other media, unless artificially constrained by regulation. The current PD requires carriers to post service rates, terms, and conditions on a website, along with a toll-free telephone number which a customer can call to receive a hard copy of those rates, terms, and conditions. Anything beyond that requirement would constrain competition.¹⁹ Carriers should have broad flexibility to determine how best to meet the contractual and informational needs of their customers.

DRA wants the PD modified to require carriers to post individual case basis (ICB) contracts on their public websites. DRA's proposal again exhibits a misunderstanding or rejection of the competitive marketplace. In that marketplace, it may make sense to post generally available rates, terms, and conditions on a website; it does not make sense for ICB contracts. An ICB contract is individually negotiated with a customer. In contrast, the vast majority of customers purchase services subject to generally available rates, terms, and conditions. Additionally, carriers and their customers in a competitive environment should not be required to make publicly available to competitors the terms and conditions of their negotiated ICB contracts. Contrary to DRA's suggestion in its comments, ICB contracts will not be "invisible" to the Commission; it will continue to have general investigative authority to review the contracts as necessary. The PD states in Finding of Fact 20 that the requirement for website posting applies to "information that is substantially equivalent to information previously contained in [*carriers'*] *tariffs*" (emphasis

¹⁶ See, e.g., DRA, pp. 6, 13.

¹⁷ See, e.g., *id.* at 8-9; TURN, pp. 10-11.

¹⁸ PD, p. 61.

¹⁹ *Id.* at 38, 46, 67 (FoF 22), 70 (CoL 11).

added). This language excludes ICB contracts and should not be changed. The Commission should reject DRA's proposal.

DRA contends that certain tariff terms and conditions should apply to *detariffed* services.²⁰ Detariffing, however, means just that: no tariff rates, terms, or conditions apply to the detariffed service. Applying tariff terms to a service is not detariffing as envisioned by §495.7 and the URF Decision. DRA's contention should be rejected.

TURN argues the PD must clarify the term "consent" as used in the context of the PD's requirement that a carrier obtain a customer's consent before including a unilateral rate increase or more restrictive term or condition in a term contract. Such clarification is not needed; in fact, no Commission oversight is needed in this area. Detariffing is intended to eliminate the Commission dictating the terms and conditions for carriers' services and the means by which carriers establish and change contractual relationships with their customers. Carriers are subject to a myriad of legal requirements (for which there is a vast body of law) establishing when and how they establish and change contracts with their customers, including how contracts can be modified and what constitutes valid consent by the parties to those modifications. In a detariffed environment, the Commission can and should defer to this body of law to govern the contractual relationships of carriers and their customers, just as society does for businesses and customers in other competitive industries. TURN's request for the Commission to define consent is unnecessary and should be rejected.²¹

III. MORE ONEROUS ADVICE LETTER AND TARIFF REQUIREMENTS SHOULD BE REJECTED.

DRA claims the PD errs by not allowing protests to URF carrier rate changes on the grounds that the new rate is not "just and reasonable."²² TURN similarly complains that the PD "goes too far" by prohibiting such protests.²³ The URF Decision correctly found that price regulation is no longer needed to ensure that prices are just and reasonable.²⁴ As the PD observes, DRA either rejects or misunderstands the URF Decision's findings regarding competition and, in particular, the Commission's conclusion that in a competitive market the rates of market participants are disciplined by each other's offerings.²⁵ Contrary to DRA's and TURN's arguments, it is entirely appropriate for the PD to preclude protests that allege a rate is unjust and unreasonable as such protests are inconsistent with the Commission's findings and conclusions.²⁶

²⁰ DRA, p. 14.

²¹ Additionally, as AT&T California explained in its opening comments (pp. 10-11), the PD's mandating of notice requirements for term contracts is inappropriate where the negotiating parties agree on when and how notice will be provided.

²² DRA, pp. 3-5.

²³ TURN, pp. 13-15.

²⁴ URF Decision, p. 132.

²⁵ PD, p. 28.

²⁶ In support of its argument, DRA points to the CHCF-B Proposed Decision in R.06-06-028 ("CHCF-B PD"). There is nothing in the CHCF-B PD that can be read to suggest that there has been a failure of competition. The CHCF-B PD focuses on the determination of an affordable rate for the primary residential access line in high cost areas based on public policy considerations. No other service is at issue, and there is no suggestion that services subject to full pricing flexibility under URF should be treated any differently in high cost areas.

DRA also erroneously asserts that the PD must remove tariff limitations of liability and the protections of the filed rate doctrine for *tariffed services*.²⁷ Apparently, DRA believes the inability to protest the reasonableness of price changes somehow transforms a tariffed service into a non-tariffed service, notwithstanding the tariff on file with the Commission. DRA's position is untenable. A service subject to a tariff filed with the Commission is by definition and law a tariffed service and appropriately subject to tariff limitations of liability and the filed rate doctrine. Additionally, DRA's concern – the reasonableness of price changes for services with full pricing flexibility – is unfounded for the reasons previously indicated.

DRA asks that the PD be modified to adopt penalties for improperly filed advice letters.²⁸ The PD, however, already recognizes that the Commission has authority to order appropriate remedial action when necessary.²⁹ Remedial action should be based on the facts and circumstances giving rise to such action, and it would be inappropriate for the Commission to arbitrarily prejudice the need for a penalty. DRA's proposal should be rejected.

DRA claims the PD's requirement that tariffs remain for "9-1-1 or other emergency services" should include a listing of "other emergency services."³⁰ The current language may be unclear, but DRA's recommendation is inconsistent with the intent of the PD, which states: "[d]ifferent considerations lead us to conclude that the requirement to provide *emergency service via 9-1-1* may not be modified or cancelled by filing an advice letter."³¹ Clearly, the emergency services to which the exception is addressed are those provided via 9-1-1. The PD, therefore, should be clarified to state that the tariff requirement remains for "emergency services provided via 9-1-1."

DRA opposes the PD's determination that issues raised in a protest to a Tier 1 advice letter should be resolved within 150 days.³² Despite DRA's opposition, it is entirely reasonable to expect a Tier 1 protest to be resolved within 5 months. The 150-day interval promotes regulatory certainty and should be left unchanged.

Dated: August 20, 2007

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²⁷ DRA, p. 5

²⁸ *Id.* at 10, 11.

²⁹ PD, p. 20.

³⁰ DRA incorrectly suggests that even call waiting and distinctive ringing may be emergency services.

³¹ *Id.* at 58 (emphasis added).

³² DRA, pp. 10-11.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing document, **“REPLY OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U 1001 C) TO COMMENTS ON THE PROPOSED DECISION OF COMMISSIONER CHONG CLARIFYING RULES FOR ADVICE LETTERS UNDER THE UNIFORM REGULATORY FRAMEWORK AND ADOPTING PROCEDURES FOR DETARIFFING”** to be served on all known parties to **R.05-04-005/R.98-07-038** who have e-mail addresses. Any party on the Appearance or State Service list that has not provided the Commission an electronic mail address was served by first class, paper mail, a copy properly addressed to each party.

Executed at San Francisco, California on the 20th day of August 2007.

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Service Lists

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